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9 **UNITED STATES DISTRICT COURT**

10 **CENTRAL DISTRICT OF CALIFORNIA, SOUTHERN DIVISION**

11

12 JOHN D. THOMAS,

) Case No. 8:23-cv-00236-DOC-JDE

) Assigned for all purposes to:

)

13 Plaintiff,

) **DECLARATION OF DAVID G.**

14 vs.

) **EPSTEIN IN SUPPORT OF MOTION**

15 LEAGLE, INC., a former Arkansas

) **FOR ALTERNATIVE SERVICE**

16 corporation; and DOES 1-25,

)

17 Defendants.

) Date: April 17, 2023

) Time: 8:30 am

) Courtroom: 10A

)

20

21 I, David G. Epstein, say:

22 1. I am a licensed California attorney and have been admitted to the bar of this

23 court. I make this declaration in my capacity as counsel for plaintiff in this case, in

24 support of a motion to authorize service of process on defendant Leagle, Inc., by

25 uploading the summons and complaint in the location solicited in said defendant's

26 website.

1 2. Defendant Leagle, Inc. publishes information regarding litigation and
2 court decisions, and it appears that it makes money from lawyer advertising.
3 Leagle has a page on its website through which one may contact it. Given its
4 business model, it appears likely that such contacts are likely to be attended to. A
5 true copy of the contacts page at www.leagle.com/contact-us, as opened on
6 March 24, 2023, is attached as Exhibit 1 and incorporated by this reference. A
7 search of Leagle, Inc.'s site did not disclose any physical or mailing address.

8 3. An Internet search suggested to me that Leagle, Inc. was an Arkansas
9 corporation. I went to the website of the Arkansas Secretary of State and searched
10 for the entity. It came up as having its corporate status "revoked" but provided
11 an address for service of process. A true and correct copy of the listing as
12 accessed on March 24, 2023 is attached as Exhibit 2 and incorporated by this
13 reference.

14 4. The Arkansas Secretary of State listing gives the name of Komal Mustafa
15 as fulfilling various roles in the corporation, and lists no one else. A search on
16 beenverified.com identified two persons with that name, both in Texas and with
17 no stated Arkansas connections. I have no reason to know whether these two
18 individuals are in any way connected with Leagle, Inc. I searched the internet if
19 various ways, but was unable to identify a Komal Mustafa who was clearly
20 connected to the defendant, such that I would be confident that service on him
21 was good service on this entity.

22 5. I went to the "Whois" registry of Internet addresses, which usually
23 identifies who owns a particular domain name. In this case, the owner was listed
24 as Perfect Privacy, LLC, in Jacksonville, Florida. A true and correct printout of the
25 relevant page from the registry as contacted on March 24, 2023, is attached as
26 Exhibit 3 and incorporated by reference.

1 6. On March 24, 2023, I went to [www.networksolutions.com/domains/
private-domain-registration](http://www.networksolutions.com/domains/private-domain-registration). This site identifies itself as one which a person can
2 pay to have its ownership interest in a website disguised by using the
3 anonymizing services of Perfect Privacy, LLC. In other words, at Whois, the
4 owner is listed as Perfect Privacy, LLC, in order to disguise the identify of the
5 true owner. A true and correct copy of the relevant portions of this web page as
6 reviewed on March 24, 2023, is attached as Exhibit 4 and incorporated by this
7 reference.

9 7. This investigation suggests that Leagle, Inc. wishes to conceal its
10 ownership, address, and identity from contact by all means except the "contact
11 us" page on its website. Because it conducts business and claims corporate status,
12 its obscure address and identify information are unfair to persons who have
13 claims against it that they wish to assert. Although Leagle, Inc. is certainly
14 entitled to notice of claims against it and an opportunity to respond, it should not
15 be able to conduct public business on the World Wide Web, and at the same time
16 conceal its location and identity.

17 8. Accordingly, plaintiff respectfully asks this court to authorize electronic
18 service on Leagle, Inc through its web page "contact us" function.

19 9. If called as a witness, I could and would testify to the matters contained
20 herein, which I know of my own personal knowledge, except for those matters
21 stated upon information and belief, and as to them, I believe them to be true.

22 10. I declare under penalty of perjury under the laws of the state of
23 California that the foregoing is true and correct.

24 Executed At Laguna Beach, California, on March 24, 2023.

26 /s/ David G. Epstein

27 _____
28 David G. Epstein, Declarant

EXHIBIT 1



1

A circular network graph with many nodes.

LAWYER LOGIN

Contact Us

Please Provide Information About You

Name*

Email Address*

Your Comments*

Digitized by srujanika@gmail.com

EXHIBIT 2



Search Incorporations, Cooperatives, Banks and Insurance Companies

This is only a preliminary search and no guarantee that a name is available for initial filing until a confirmation has been received from the Secretary of State after filing has been processed. Please review our [NAME AVAILABILITY GUIDELINES HERE](#) prior to searching for a new entity name.

[Printer Friendly Version](#)

LLC Member information is now confidential per Act 865 of 2007

Use your browser's back button to return to the Search Results

[Begin New Search](#)

For service of process contact the [Secretary of State's office](#)

Corporation Name	LEAGLE INC.
Fictitious Names	
Filing #	811023198
Filing Type	For Profit Corporation
Filed under Act	Dom Bus Corp; 958 of 1987
Status	Revoked
Principal Address	
Reg. Agent	RED DIAMOND BUSINESS CONSULTANTS LLC
Agent Address	609 SW 8TH STREET 6TH FLOOR BENTONVILLE, AR 72712
Date Filed	10/19/2012
Officers	KOMAL MUSTAFA , Incorporator/Organizer KOMAL MUSTAFA , Tax Preparer KOMAL MUSTAFA , President KOMAL MUSTAFA , Secretary KOMAL MUSTAFA , Vice-President KOMAL MUSTAFA , Treasurer KOMAL MUSTAFA , Controller
Foreign Name	N/A
Foreign Address	
State of Origin	N/A

[Pay Franchise Tax for this corporation](#)

EXHIBIT 3



WHOIS

[DOMAINS](#)[WEBSITE](#)[CLOUD](#)[HOSTING](#)[SERVERS](#)[EMAIL](#)[SECURITY](#)[WHOIS](#)[SUPPORT](#)[LOGIN](#)

0

leagle.com

Updated 11 days ago

Interested in similar domains?

Domain Information

Domain:	leagle.com
Registrar:	Network Solutions, LLC
Registered On:	1997-01-09
Expires On:	2026-01-08
Updated On:	2022-11-11
Status:	clientTransferProhibited
Name Servers:	ns37.worldnic.com ns38.worldnic.com

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[3leagle.com](#)

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[xeagle.net](#)

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Registrant Contact

Name:	PERFECT PRIVACY, LLC
Street:	5335 Gate Parkway care of Network Solutions PO Box 459
City:	Jacksonville
State:	FL
Postal Code:	32256
Country:	US
Phone:	+1.5707088622
Email:	xb7s827x35t@networksolutionprivateregistration.com

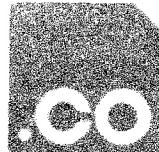
.COM

\$11.88 *\$10.48

BUY NOW

Offer ends 31st March 2023

On Sale!

**Administrative Contact**

Name:	PERFECT PRIVACY, LLC
Street:	5335 Gate Parkway care of Network Solutions PO Box 459
City:	Jacksonville
State:	FL
Postal Code:	32256
Country:	US
Phone:	+1.5707088622
Email:	xb7s827x35t@networksolutionprivateregistration.com

.CO @ \$14.88 \$31.88

-9-

EXHIBIT 4



AINS WEBSITE & eCOMMERCE HOSTING SECURITY EMAIL & PRODUCTIVITY ONLINE MARKETING IT SERVICES RE SE

Private Domain Registration

Hide your personal information from spammers, telemarketers, and bots

\$9.99/year per domain name



[ADD PRIVATE DOMAIN REGISTRATION](#)

Or [search for a domain](#)

How does Private Registration work?

UNPROTECTED vs. PROTECTED

Without Private Registration

Steve Walker

swalker@softball.org
2801 NE 50th Street
Oklahoma City, OK 7311-7205
Phone: +1-555-985-4480

Your information is

exposed



With Private Registration

Perfect Privacy, LLC.

ad7536snryy191@perfectprivacy.com
5335 Gate Parkway
Jacksonville, FL 32256
Phone: +1-570-708-8780

Your information is

protected

